# UNITED STATES DISTRICT COURT EASTERN DISTRICT - WI EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

STEPHEN C. DRIEG

v.

TOMMY LEE JENKINS,

Defendant.

[18 U.S.C. §§ 2422(b) and 2423(b)]

Green Bay Division

## **INDICTMENT**

#### **COUNT ONE**

### THE GRAND JURY CHARGES THAT:

Between on or about October 1, 2019, and October 10, 2019, in the State and Eastern District of Wisconsin and elsewhere,

#### TOMMY LEE JENKINS,

using a facility and means of interstate commerce, did knowingly attempt to persuade, induce, entice, and coerce a person who had not yet attained the age of 18 years to engage in sexual activity for which the defendant could be charged with a criminal offense, namely, sexual contact and sexual intercourse in violation of Wisconsin Statute Section 948.02(2) (second-degree sexual assault of a child).

In violation of Title 18, United States Code, Section 2422(b).

# **COUNT TWO**

# THE GRAND JURY FURTHER CHARGES THAT:

Between on or about October 1, 2019, and October 10, 2019, in the State and Eastern District of Wisconsin and elsewhere,

## TOMMY LEE JENKINS

did travel in interstate commerce for the purpose of engaging in illicit sexual conduct with a minor.

In violation of Title 18, United States Code, Section 2423(b).

A TRUE BILL:

FOREPERSON

Dated: October 220, 2019

MATTHEW D. KRUDGER
United States Attorney